

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

Illinois Commerce Commission	:	
On Its Own Motion	:	
	:	20-NOI-01
Notice of Inquiry Regarding Energy	:	
Affordability	:	

**ILLINOIS-AMERICAN WATER COMPANY'S
INITIAL COMMENTS**

Dated: September 30, 2020

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Illinois-American Water Company (IAWC) submits these Initial Comments in response to the Illinois Commerce Commission's March 18, 2020 Notice of Inquiry (NOI) Regarding Energy Affordability.

IAWC is a public utility within the meaning of the Public Utilities Act, 220 ILCS 5/3-105, and is now engaged in the business of furnishing potable water service and/or sanitary sewer service to approximately 341,000 customers in the State of Illinois. IAWC therefore offers the below responses to the Commission's NOI questions to public utilities and all interested persons from a water and wastewater public utility industry perspective, to the extent the requested information is available or IAWC has information it considers useful to provide the Commission, to aid the Commission in evaluating what information is available regarding the affordability of utility services, what the current state of the affordability of utility services is, and the impact on affordability of current programs and measures.

A. Information and Reporting

- 1. Information to be submitted by month and calendar year for the period beginning January 1, 2013 through December 31, 2019. If the information is not available, please address the feasibility of providing the information and include any recommendations regarding the format and other relevant parameters related to filing the information.¹**

For the data requested in Section A.1, please see Attachment A, Tab 1. Please note that subsections (e) and (f) below are not applicable to IAWC. Further, please note that IAWC converted to a new SAP system in May 2013, and therefore information on the Attachment is provided from that date. In addition, please note that for a short period after May 2013, IAWC did not do disconnections as the new system was being integrated, so for several months the figures

¹ If information is currently reported to the Commission in another report, please identify the report and the entity to which it is reported (e.g., Chief Clerk's Office, Director of the Financial Analysis Division, etc.).

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provided in certain categories of Attachment A, Tab 1 reflect this.

- a. **the number of residential customer accounts that were disconnected during the period for non-payment and that remained disconnected (displacement) during the entire period.**
- b. **the number of residential customer accounts that were disconnected during the period and reconnected within 12 months.**
- c. **the number of residential customer accounts that received service and had past due balances.**
- d. **the number of residential customer accounts that were on deferred payment arrangements.**
- e. **the number of residential customer accounts that were on an arrearage reduction program.**

(Other than deferred payment arrangements and bill payment assistance, IAWC does not have an arrearage reduction program; accordingly, there is no information to be provided in response to subsection (e).)

- f. **the number of residential customer accounts for which the utility required a deposit and the average size of residential deposits.**

(IAWC does not require deposits from customers; accordingly, there is no information to be provided in response to subsection (f).)

- g. **the number of residential customer accounts that provided a medical certificate in response to a disconnection notice.**
- h. **the amount of payment and the number of residential customer accounts that received bill payment assistance, including but not limited to low-income energy assistance programs such as the Low-Income Home Energy Assistance Program (LIHEAP), state programs such as the Percentage of Income Payment Program (PIPP), utility programs, and social service programs such as Catholic Charities, Salvation Army or other charitable service organizations.**

(The number of accounts, and not the amount of payments, is being provided in response to subsection (h).)

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- 2. Please provide this information by census block, census block group, census tract, zip code, zip code plus four and/or as many categories as you have available. Please provide the information both by month and calendar year for periods beginning with January 1, 2013 and through December 31, 2019. If the information is not available, please address the feasibility of providing the information and include any recommendations regarding the format and other relevant parameters related to filing the information.²**

For the data requested in Section A.2.b.a, A.2.b.b, and A.2.b.c, please see Attachment A, Tab 2. For the data requested in Section A.2.b, please see Attachment A, Tab 4. For the data requested in Section A.2.b.d, please see Attachment A, Tab 3. For the data requested in Section A.2.b.e, A.2.b.f, and A.2.b.h, please see Attachment A, Tab 4. For the data requested in Section A.2.c and A.2.d, please see Attachment A, Tab 1. Please note that subsections A.2.a, A.2.b.i, and A.2.e are not applicable to IAWC.

- a. Number of accounts that received:**
 - i. LIHEAP-Direct Vendor Payment**
 - ii. LIHEAP Reconnection/Emergency Assistance**
 - iii. Participated in PIPP**
- b. Number of accounts that entered into a Deferred Payment Agreement (DPA) and:**

² If information is currently reported to the Commission in another report, please identify the report and the entity to which it is reported (e.g., Chief Clerk's Office, Director of the Financial Analysis Division, etc.).

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- i. Average arrearage amount**
- ii. Average monthly installment payment amount**
- iii. Average length of DPA**
- iv. Number of DPAs by length of DPA (number of months)**
- v. Number of DPA defaults**
- vi. Number of DPA reinstatements**
- vii. Number of DPA renegotiations**

(IAWC offers customers renegotiation of DPAs, but IAWC's system does not track if a DPA is renegotiated; accordingly, there is no information to be provided in response to subsection (g).)

- viii. Number of DPA successfully completed**
- ix. Number of accounts that received energy service from an independent (natural gas or electricity) provider.**

- c. Number of accounts that were involuntarily disconnected for non-payment, including the number of such accounts that received energy service from a competitive retail (natural gas or electricity) provider.**

(IAWC as a water utility does not provide energy service; accordingly, there is no information to be provided in regard to accounts receiving energy service.)

- d. Number of accounts that were involuntarily disconnected during the period and that also had been disconnected previously within 24 months for non-payment.**
- e. Number of accounts that were involuntarily disconnected for furnace red-tag.**
- f. Number of accounts that were on an arrearage reduction program.**

(Other than deferred payment arrangements and bill payment assistance, IAWC does not have an arrearage reduction program; therefore information in response to subsection (f) is not being provided.)

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- g. Number of chapter 7 or chapter 13 bankruptcies notices received where the utility is listed as a creditor.**

For the data requested in Section A.2.g, please see Attachment B.

- h. Is the above information by census block, census block group, census tract, zip code, or zip code plus four available electronically for mapping purposes? If not, why not and how can mapping be enabled with the information maintained by the utility?**

The information is provided by zip code.

B. Credit and Collections Practices

IAWC's credit and collections practices are consistent with the practices outlined in the Commission's Part 280 Rules governing eligibility for service, deposits, billing, payments, refunds, and disconnection of service.

- 1. Please identify and describe formal, written, and informal collection practice procedures.**

IAWC's collection process is driven by its internal procedures in compliance with the ICC Rules and IAWC's Commission-approved tariffs. IAWC has systems in place to allow a customer account to move through the collection process automatically.

From an account set up perspective, IAWC has two ways that it can verify customer identity and confirm any existing debt or delinquency issues at the time a customer account is set up. First, IAWC's internal software, SAP, contains a delinquency check that allows the customer service representative (CSR) to locate possible matches for customers who may have outstanding debt. The SAP program also reviews the premise address to ensure that there are no previous collection activity or concerns that may need to be addressed by the CSR at the time of setup for the premise. Second, IAWC's CSRs also have access to a third-party vendor software, LexisNexis, in order to verify residency, if needed. LexisNexis also provides assistance to verify customer identity and prevent fraud by providing last known occupants for a specific property or

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the reported mailing addresses for a specific person.

Once an account is established, IAWC evaluates customers on a continual basis using an internal metric as a means to segment collection strategies. Customers are assessed points by the SAP program for being delinquent, having notices issued, defaulting on installment plans, orders for disconnection required, theft of service and bankruptcy, etc. The point value varies depending on the collection step(s) required and is active for a rolling 12-month period. This value is internal to IAWC only and not reported to any outside agency or firm. This metric helps IAWC ensure that collection efforts can be targeted to the proper customers.

Should a customer's account become delinquent, IAWC uses various steps to notify customers that their account needs to be brought current. Letters are sent to the customer through the SAP software to notify the customer of the delinquency and telephone calls are placed to customers through use of a third-party vendor to encourage customers to bring their account current.

The creditworthiness and timing of certain collection letters being sent are included in Attachment C (Collection Life Cycle) which lays out in more detail the collection process. If a customer does not cure an account within 17 days of the account being closed, the account is placed with a third-party vendor who continues to attempt to collect the debt. Customers may cure the account anytime during this process.

Finally, during any point in these processes, customers may request an installment plan to make smaller payments to IAWC over time on a large outstanding balance. Customer installment plan agreements can continue on an unlimited basis for customers who successfully complete the agreed upon terms. Customers may also submit a medical certificate in order to retain water services in the home if there is a medical issue within the home.

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2. If actual collection practices are different from formal or written procedures, explain the rationale for the modification.

IAWC follows the above process for collections. If a customer has extenuating circumstances, such as, for example, a service line leak, IAWC would attempt to help the customer retain water services which may necessitate a non-standard individualized response for the customer. In this situation, collection practices on a more customer individualized level are utilized in an attempt to resolve the outstanding balance.

3. Identify how you can improve your existing collection practices and any plans for doing so.

In the fourth quarter of 2019, IAWC did a full collection practice assessment. This assessment consisted of more notifications to the customers via phone and email, before a disconnection occurs. Also, IAWC initiated more comprehensive, real time reporting for accounts receivable. Lastly, in 2021, IAWC plans to begin to explore text messaging for notifications.

4. Please identify and describe the training for utility representatives who interact with consumers (Customer Services Representatives or CSRs) and the tools available for consumers who have billing issues, such as:

IAWC's CSRs go through six weeks of overall training, a portion of which is targeted to assisting customers with billing issues. For Sections B.4(a) and (d), please see Attachment D (Higher Than Expected Bills).

a. Determining consumers' ability to pay their bills and challenges for consumers in doing so.

b. Eligibility for public or private bill assistance

Please see Attachment E (Disconnection Service Orders). IAWC does not turn away any payments offered towards a customer's bill.

c. Referrals to assistance programs and community services

Please see Attachment E (Disconnection Service Orders).

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d. Consumer communication impediments.

IAWC's CSRs are trained to conference in a language interpreter when one of our customers' needs to converse in a language other than English. IAWC bills also have instructions for the hearing impaired: TTY/TDD for the Hearing Impaired: 711 then reference the Customer Service number 1-800-422-2782.

5. Please identify and describe tools used to encourage payment, including but not limited to detailed terms of deferred payment arrangements (including length of pay-back period and amount of payments), waiver of fees, and other discretionary accommodations.

As a general matter, IAWC follows the provisions of 83 Ill. Admin. Code Part 280 for payment arrangements and other means to encourage payment, as listed below. IAWC offers flexible payment arrangements and resources to our customers that may have difficulty when paying their bills.

In addition to the provisions of 83 Ill. Admin. Code Part 280, IAWC sponsors and funds an H2O (Help to Others) program that is administrated by the Salvation Army. Under the program, the standard amount a customer can receive is \$75.00, but on a case-by-case basis IAWC can intercede and request that the Salvation Army provide more funding to a particular customer. IAWC's CSRs offer agency information to customers when working with them on payment arrangements.

Payment Options include:

Installment Plans (DPA-deferred payment arrangements)

IAWC offers flexible payment arrangements with a minimum of 25% down and minimum repayment time of 4-6 months. IAWC does request that customers put their down payment in place at the time of the creation of the installment plan. IAWC may offer longer repayment times to customers, depending on the amount and their situation. IAWC also has medical certification installment plans available for those with medical conditions.

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Budget Billing

IAWC offers budget billing and budget billing/installment plan for customer's with high balances as described above.

Payment Time Extension

IAWC offers payment time extensions to customers when they call in and say they can't make a payment by the set due date. IAWC will put a lock on their account to prevent the dunning process during a specific time period. IAWC considers this very valuable tool in terms of payment flexibility especially for those with smaller balances.

IAWC also does not require deposits for new customers, waives late payment fees for low income customers, offers one time courtesy and leak adjustments, and offers preferred payment dates.

- 6. Please identify and describe tools to reduce delinquencies and disconnections, including new or expanded bill affordability programs such as percentage of income payment plans, discount rates, consumer education, expanding existing shutoff protections, customer payment plans, and flexible bill due dates.**

Please see above response to B.5. IAWC also has flexible bill-pay options. The customer can move the bill pay date ten days before or after the original due date one time during a rolling calendar year.

C. Definitions

- 1. How should the following terms be defined? Are there federal or other state standards or guidelines that more clearly define these terms?**

a. Affordability

IAWC is not aware of a statute-, administrative rule-, or tariff-based definition of "affordability" and does not itself have a specific definition of "affordability." IAWC considers the term to be highly subjective, but "Affordability" could be defined as a certain percentage of median household income necessary to pay a household's total basic service for water and wastewater for the year.

b. Low-Income

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IAWC follows the Part 280 definition. 83 Ill. Admin. 280.20 defines “Low Income Customer” as follows:

"Low Income Customer" means a residential customer who has qualified under the income criteria of Section 6 of the Energy Assistance Act of 1989 [305 ILCS 20/6]. Qualification is effective for purposes of this definition when the Low Income Home Energy Assistance Program (LIHEAP) administrator notifies the customer's utility of the customer's low income status. Unless water and sewer utilities begin participation in a low income assistance program with the LIHEAP agencies, it shall be the individual customer's responsibility to notify and provide proof to the water and/or sewer utility of the customer's low income status under the income criteria of Section 6 of the Energy Assistance Act of 1989. Qualifications established on or after September 1 shall remain effective for purposes of this definition until December 31 of the following year. Qualifications established before September 1 shall remain effective until December 31 of that same year. The utility shall notify the customer 30 through 90 days prior to the expiration of a customer's qualification.

c. Critical Medical Needs Customers

IAWC follows Part 280 for medical certificates. Per 83 Ill. Admin Code 280.160(d)(4), to be eligible for medical certificates, a customer must certify: “the disconnection of utility service will aggravate an existing medical emergency or create a medical emergency for the patient.”

d. Delinquency

IAWC is not aware of an Illinois specific statute- or administrative rule-based definition of “delinquency” in the context of utility service bill payment . IAWC’s tariff states: “15(F) - All bills for Water Service are due and payable through payment methods established by the Company on or before the due date printed on the bills, and are considered delinquent if not paid by such date. For Residential Service, the due date printed on the bill will be not less than twenty-three (23) days after the date of the postmark, if mailed, or the date of delivery as shown on the bill if delivered by other means. For non-Residential Service, the due date printed on the bill will be not less than sixteen (16) days after the date of the postmark, if mailed, or the date of delivery as shown on the bill if delivered by other means. ...” See ILL. C. C. No. 23, First Revised Sheet No. 12, Canceling Original Sheet No. 12.

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e. Disconnection

IAWC is not aware of an Illinois specific statute-, administrative rule-, or tariff-based definition of “disconnection” in the context of utility service bill payment. IAWC tariffs define “The “Discontinuance of Service” as the cessation of Water Service not voluntarily requested by a Customer.” See ILL. C. C. No. 23, Original Sheet No. 1.

f. Displacement

IAWC does not have a specific definition of “Displacement”, and is not aware of federal or other state standards or guidelines that define it.

g. Reconnection

IAWC is not aware of a specific statute- or administrative rule-based definition of “reconnection” in the context of utility service bill payment. IAWC’s tariffs refer to “Reconnection” as turning on of water service after discontinuance of “water service to any premises because of a violation of the Rules and Regulations or on account of nonpayment of any bill for water service.” See ILL.C.C. No. 5, ILL.C.C. No. 23, and ILL.C.C. No. 24. Alternatively, “Reconnection” can be defined as “Restoration of service”, as described in ILL.C.C. No. 25, Original Sheet No. 11.

h. Vulnerable Customers

IAWC is not aware of a specific statute-, administrative rule-, or tariff-based definition of “vulnerable customer” in the context of utility service bill payment and does not itself have a specific definition of “vulnerable customer”. However, IAWC believes that the concept of vulnerability relates to customer circumstances which may significantly impact a customer’s ability to pay. For example, a customer’s ability to pay may be significantly impacted due to higher energy costs in winter months, due to health issues, or due to natural disasters or economic crises.

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- 2. Are there other undefined terms that are critical to understanding utility service affordability and/or the ability of customers to receive essential levels of electric, natural gas, water and sewer services and, if so, how should such terms be defined?**

IAWC has not presently identified undefined terms that are critical to understanding utility service affordability and/or the ability of customers to receive essential levels of electric, natural gas, water and sewer services.

D. Information Collection and Reporting

- 1. Please identify any changes that could be made to current information reporting requirements that would better inform the Commission regarding service affordability and/or the ability of customers to receive essential levels of utility services including the entities that should be required to provide the information. In your response please also address the format of such information collection, the authority for compelling the production of such information, and how the information should be publicly reported.**

IAWC has provided substantial data in response to this NOI (see Section A). IAWC also provides annual reports to the Commission (Form 22), collects and maintains data regarding certain customer metrics to be reported to the Commission upon Commission Staff's request pursuant to the Commission's Part 280 Rules, and submits Part 285 schedules as part of any rate case filing. Further, IAWC is currently providing monthly reports on customer data pursuant to the Stipulation in Docket 20-0309. IAWC believes that this existing information reporting represents meaningful and sufficient sources of data to inform the Commission regarding service affordability and/or the ability of customers to receive essential levels of utility services.

- 2. Please identify any additional information that might be collected that would better inform the Commission regarding service affordability and/or the ability of customers to receive essential levels of utility services including the entities that should be required to provide the information. In your response please also address the format of such information collection, the authority for compelling the production of such information, and how the information should be publicly reported.**

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See response to D.1.

E. Assistance Programs

1. What assistance programs are available to residential customers that help them pay for utility service and receive a continuous supply of essential utility services and how effective are these programs?

See the responses to Section B.4 and B.5 above. Unlike the electric and gas utilities, IAWC does not have any statutory financial assistance programs like the Energy Assistance Act (305 ILCS 20). IAWC works with the following program:

H2O (Help To Others) Program – An emergency assistance program created by Illinois American Water and Illinois' Salvation Army agencies. The program helps provide supplemental funding to Illinois American Water customers who would otherwise have trouble paying their bills. H2O Help to Others is supported by contributions from IAWC and voluntary contributions from customers. The Salvation Army agencies' trained caseworkers determine the needs of families and individuals, who must be IAWC customers.

This Program often connects customers with other sources of aid in their communities, including other assistance programs for which they might qualify. Some of the Salvation Army agencies also provide educational programs on managing utility usage and bills.

2. What changes could make the programs more effective?

Implementation of a water and sewer low-income customer assistance program which could be similar to the framework set forth in 305 ILCS 20/13. IAWC has not identified any changes to the H2O program that would make it more effective at this time.

3. Identify appropriate criteria for evaluating program effectiveness.

IAWC has assigned a program administrator for our H2O program. The administrator works directly with the Salvation Army to ensure that monthly reports of customers who were helped are submitted; funding is available; if need be, to reallocate funds to help an area that is experiencing more of a demand than others; and to work with the Salvation Army to ensure that available help is given to the agencies that direct individuals to available resources.

4. What portion of the eligible population is served by existing assistance programs?

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Under the H2O Help To Others Program, any individual or family whose water service is being provided by IAWC and who is in danger of losing their primary source of water and meets the "basic needs" criteria as set by Salvation Army caseworkers is eligible.

5. What outside sources of funding other than the identified assistance programs do residential customers use to pay past due utility bills, such as tax refunds, credit cards or personal loans?

IAWC does not have the ability to determine if customers are using personal loans and/or tax refunds to pay their bills. IAWC will accept payment by a third party - if someone handles paying a customer's bill, such as a relative, trustee or social service organization, IAWC sends a copy of the bill, as well as a reminder, past-due and shut-off notices, to that third party.

IAWC provides customers with the option to pay online, by phone, by mail and in person. For online payments, customers can pay by credit card and schedule automatic payments from bank accounts. For credit card payments by phone, customers simply call in with their Visa or Mastercard number and account number. For bank account payments by phone, customers call in and speak with a customer service representative.

6. Are there programs not currently available in Illinois, including programs adopted in other states, that could increase affordability and/or the ability of customers to receive essential levels of electric, natural gas, water and sewer services?

Across American Water's footprint, various customer assistance programs or mechanisms are in place, including:

- **Low-Income Tariff** – California, Indiana (Pilot), Missouri (Pilot), New Jersey, Pennsylvania, West Virginia;
- **Conservation (New Jersey and Pennsylvania)** – New Jersey American Water offers a conservation program to qualified low income residential customers free of charge, which can include instructions on performing a home water audit, a retrofit kit for use with certain appliances and fixtures, and a leak repair of fixtures for which the customer is normally responsible up to a \$300 maximum. The Company pays Dollar Energy to administer the conservation program. Pennsylvania American Water

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offers to qualifying customers, education on conservation measures, conservation kits with water saving devices (and installation assistance for those who are unable to install the devices) and minor plumbing repairs for those with plumbing leaks.

- **DSIC (“Distribution System Improvement Charge”) Exemption (New Jersey)** - Provides to qualified low income water residential customers who already receive the above fixed service charge credit a monthly bill credit equal to the customer monthly DSIC charge (maxed at 1 inch meter).
- **Late Fee Exemption (Kentucky)** – Customers receiving low-income assistance from an authorized Agency are not required to pay a late fee on a bill for which the customer is receiving assistance.

F. Credit and Collections Practices

- 1. Please identify and describe best collection practices and how existing collection practices can be improved.**

Please see response in Section B.

- 2. Please identify and describe any concerns regarding privacy associated with collecting, storing and/or sharing of consumer information.**

IAWC does not store sensitive customer personal data, including social security numbers, driver’s license numbers and credit card information. Currently the company is implementing a program to allow our customers to go online and choose their customer privacy rights, including right to access, right to erase and right to opt-out.

- 3. Within the following subjects as they relate to affordability, please identify and describe practices/concepts that are currently working well, areas that can be improved and ideas/plans for improvement:**

a. Communications/Outreach

IAWC believes that generally its customer communications work well. Continuous training of IAWC’s CSRs is also in effect. A recent example of IAWC’s efforts in this area is an extensive review of the letters that are sent to IAWC’s customers to increase customer ease of understanding..

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b. CSR tools to identify consumer budget needs/challenges

See responses to B.4 and B.5 above. IAWC does not have an automated tool to identify consumer budget needs/challenges. This identification occurs in a conversation between the CSR and the customer at the time of the call. The CSR will then give all options to the customer that the customer is eligible for. This process is successful and more open for the customer to choose one of IAWC's many options.

c. Encouraging payment

See responses to B.4 and B.5 above. The CSR provides all payment options to the customer.

d. Referrals to Community Services

See responses to B.5 and E.1 above. As Project H2O is IAWC's program, the CSRs predominantly direct our customers to this program and their local Salvation Army office. The Salvation Army can also assist our customers to find other agencies that might be able to help them.

e. Privacy and Consumer concerns about sharing data

As discussed above, IAWC does not store sensitive customer personal data, including social security numbers, driver's license numbers and credit card information. Currently the company is implementing a program to allow our customers to go online and choose their customer privacy rights, including right to access, right to erase and right to opt-out.

G. Energy Efficiency Measures

Please note that this section is not applicable to IAWC.

- 1. What current utility energy efficiency programs aimed at increasing the affordability and/or the ability of customers to receive essential levels of electric services are available and how effective are they?**

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- 2. What energy efficiency information, surveys or other data are available that address the effect of utility energy efficiency program participation on affordability and/or the ability of customers to receive essential levels of electric services?**
- 3. With respect to energy efficiency technology penetration:**
 - a. How many customers continue to use incandescent light bulbs?**
 - b. How many customers have advanced thermostats?**
 - c. What existing energy efficiency technologies, if more widely deployed, can increase affordability and/or the ability of customers to receive essential levels of electric services?**
- 4. What changes could be made to utility energy efficiency programs to make them more effective at increasing the affordability and/or the ability of customers to receive essential levels of electric services?**
- 5. How effective are weatherization programs currently available to customers at increasing affordability and/or the ability of customers to receive essential levels of electric and natural gas services?**
- 6. Identify obstacles faced by low-income consumers that prevent them from participating in weatherization programs?**
- 7. What changes could be made to weatherization programs to make them more effective at increasing the affordability and/or the ability of customers to receive essential levels of electric services?**

H. Distributed and Community Solar

Please note that this section is not applicable to IAWC.

- 1. What distributed and community solar programs are currently available to customers that increase affordability and/or the ability of customers to receive essential levels of electric services, how effective are the programs at achieving these objectives, and what changes could make the programs more effective?**
- 2. Are there programs not currently available in Illinois, including programs adopted in other states, that could increase affordability and/or the ability of customers to receive essential levels of electric services?**

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Respectfully submitted,

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